

outcome given the near heroic efforts by Congress and the Joint Board elsewhere to encourage rural access to these services.

*H. The Total Monetary Impact of Excluding Business Subscribers From Universal Service Support.*

While exact numbers may not yet be available, it is not difficult to estimate generally the impact of excluding major groups of rural business subscribers from universal service support would have on rural businesses. The impact would be enormous. Reliable estimates of the percentage of all subscribers that are businesses exist. The Commission estimates that businesses account for approximately 28% of all lines served by the largest telephone companies.<sup>36</sup> The Rural Utilities Service reported that business subscribers represent approximately 19.4% of all their members' subscribers.<sup>37</sup>

There are also reliable estimates of the total amount of universal service support. Chairman Hundt has publicly estimated the total support necessary for an explicit universal service support mechanism to be in the \$6-12 billion range. The Hatfield and BCM2 proxy models indicate that universal service support would be, respectively \$5.3 billion and \$14.6 billion.

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<sup>36</sup> Federal Communications Commission, *Statistics of Communications Common Carriers*, 1994/5 Edition, at 21.

<sup>37</sup> Rural Utilities Service, *1995 Statistical Report, Rural Telecommunications Borrowers* at 8.

Combining these two sets of estimates yields an estimate of the overall impact of the Recommended Decision's proposed cuts in universal service support. If businesses account for approximately 20-25% of all subscribers, then eliminating all support for all businesses would shift somewhere between \$1.06 and \$3.65 billion in increased costs to rural businesses on an annual basis. Depending on the estimate, even the immediate impact of cutting support for multi-line businesses and reducing support for single-line businesses could easily mean a shift of a billion dollars or more each year to rural businesses.

Even though the Recommended Decision refused to select any one existing proxy model for use by the Commission, the various proxy models offer another way to estimate the impact of excluding rural businesses from universal service support. While the two primary proxy models – Hatfield and BCM2 – yield different cost estimates in many ways, they both show dramatic and relatively similar cost differentials between urban and rural areas. For example, the BCM2 model estimates the per line cost to serve areas with under 5 lines/square mile in Arizona to be \$136.08 while per line costs in areas with over 2,550 lines/square mile was \$23.66. Both proxy models project very significant rural/urban differentials – in this case approximately \$100/line/month.

*I. The Recommended Decision's Proposed Cuts in Universal Service Support Would Impose an Undue Burden on Rural Small Businesses*

In sum, excluding major groups of rural small businesses and other rural institutions from universal service support would violate the principle of universal service for all Americans and have a serious impact on all rural consumers. It will yield rates for rural subscribers which are not reasonably comparable to rates for similar urban subscribers. These rates will also not be “affordable” for many rural small businesses.

The Office of Advocacy strongly recommends that the proposed cuts in universal service support for rural small businesses be withdrawn. These proposed cuts in universal service support are likely to lead to significant rate increases for many rural small businesses, discouraging economic development in rural areas and tending to further isolate rural America. Ultimately, the Joint Board’s recommendations on this issue could have an adverse impact on the economic structure of rural America.

*III. The Joint Board and the Commission Should Reduce Subscriber Line Charges for Multi-Line Small Businesses as Well As for Single-Line Small Businesses.*

Section XII of the Recommended Decision addresses several issues involving the subscriber line charge (SLC) and the common carrier line charge (CCL), proposing, *inter alia*, to reduce the SLC for residences and single-line businesses to reflect half of the reduction in long term support and pay telephone payments that have resulted from the 1996 Act. The Office of Advocacy commends the Joint Board for this proposed reduction. Reducing the SLC is likely to advance the goals of universal service among

these subscribers. The Office of Advocacy also concurs with other commenters such as the AARP that further cuts in the SLC cap are warranted. As AARP indicated, the cap has not decreased since being instituted in its current form while costs to provide telephone service have declined steadily since then.

The Office of Advocacy is troubled, however by the Recommended Decision's failure to recommend any reduction in the SLC for other small businesses. As indicated *supra*, a large number of multi-line businesses are small businesses which in many cases are as vulnerable to rate increases as single-line businesses. The Recommended Decision justifies an SLC reduction for single-line businesses by observing that they are "central to the provision of universal service."<sup>38</sup> While this is certainly true, the same logic would apply to a large number of multi-line businesses who are small businesses. Excluding small businesses that are multi-line subscribers from a SLC reduction when they already pay almost twice the SLC that single-line businesses pay only further shifts the costs of maintaining the network to these small businesses. Such a shift will add a further cost burden on many small businesses who are least able to recover these costs from their customers. If the Joint Board or the Commission is to distinguish between groups of telephone subscribers for the purposes of SLC reductions, it should distinguish between small businesses that are vulnerable to these incremental cost increases and larger businesses which can more easily absorb the costs or pass them on to their customers. Making the proper distinction here would become all the more important. if for some

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<sup>38</sup> Recommended Decision at ¶ 769.

reason the Joint Board's recommendation to lower the SLC is rejected by the Commission and the SLC is instead increased.

*IV. The Absence of a Regulatory Flexibility Analysis Effectively Excludes Many Small Businesses From Participating in the Joint Board's and Commission's Process.*

Although not technically required by the Regulatory Flexibility Act, the absence of a regulatory flexibility analysis in the Recommended Decision severely handicaps the decision's analysis of issues of great importance to small business and ultimately constrains many small businesses from playing any meaningful role in this proceeding. The lack of a regulatory flexibility analysis effectively silences great deal of potential input from small businesses that would otherwise have contributed to the Joint Board's and the Commission's analysis in this proceeding

The complexity and importance of this proceeding argue strongly in favor of including a regulatory flexibility analysis in the Recommended Decision. Reform of universal service support mechanisms is one of the centerpieces of the 1996 Act. It is a vastly complex subject, requiring a mastery of some of the most arcane portions of the Commission's jurisdiction. Billions of dollars of subsidies to rural, high-cost areas are at stake. Rural small businesses stand to lose a significant portion of the subsidies that have long kept their rates reasonably comparable with urban rates. Without the aid of a regulatory flexibility analysis, many affected small businesses have little hope of

understanding the process enough to make their voice heard – and ultimately to get their needs met.

The timing of the release of the Recommended Decision in the overall universal service process also argues strongly for the inclusion of a regulatory flexibility analysis. Up to now, the only analysis of this proposed rule's affect on small business has been the cursory and broad Initial Regulatory Flexibility Analysis that accompanied the Notice of Proposed Rulemaking. It gave small businesses little real indication of how the proposed rule would affect their interests. Moreover, the Final Regulatory Flexibility Analysis will come too late to be anything more than a *post mortem* and a possible ground for appeal. In the meantime, the Joint Board and the Commission will hear primarily from large businesses, many of whose interests are diametrically opposed to those of small business providers and subscribers in this proceeding.

The absence of any regulatory flexibility analysis was probably most keenly felt in the Recommended Decision's treatment of the extent of universal service support for rural small businesses. The Joint Board's proposed decision in this portion of the decision alone could cost rural small businesses a billion or more dollars in support annually. Absent any regulatory flexibility analysis, the Joint Board's analysis lacked any real understanding of how rural small businesses would be affected by its proposed cuts. No significant alternatives to these cuts appear to have been considered. Ultimately, small businesses may pay a big price for this near complete inattention to their needs.

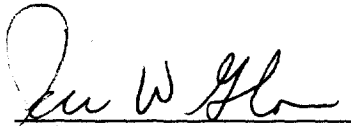
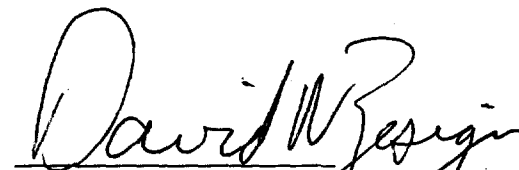
A regulatory flexibility analysis would also have enhanced and possibly even altered the Joint Board's discussion of and decision on subscriber line charges. While the Joint Board proposed to lower residential subscriber line charges from their current levels, it remained completely silent on the subject of any similar reduction in business subscriber line charges. The Joint Board attempted no explanation why one set of charges should come down and the other remain constant. Had the Joint Board prepared a regulatory flexibility analysis, these and other issues important to small business would have been addressed.

In sum, this proceeding will have an enormous impact on small businesses – perhaps the most of any of the proceedings to implement the 1996 Act. To ignore any systemic analysis of the decision's impact on small businesses is irresponsible public policy. Ultimately, it undermines the economic and policy foundations of the relevant portions of the Recommended Decision.

*V. Conclusion*

For the foregoing reasons, the Office of Advocacy recommends the Commission adopt rules consistent with the suggestions offered in this comment.

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## APPENDIX A

### Increase in Monthly Local Service Revenues Due to Eliminating Support Mechanisms for the OPASTCO Study Group LECs

State	1992 Local Service Revenues per Subscriber per Month (A)	Additional 1992 Monthly Local Service Revenues Needed (B)	1992 Revised Monthly Local Service Revenues (C)=(A)+(B)	Percentage Increase in Monthly Local Service Revenues Required (D)
Alabama	\$18.94	\$11.48	\$30.42	60.61%
Alaska	\$20.94	\$13.79	\$34.73	65.85%
Arizona	\$21.05	\$9.64	\$30.69	45.80%
Arkansas	\$16.71	\$11.95	\$28.66	71.51%
California	\$20.64	\$28.13	\$48.77	136.29%
Colorado	\$21.31	\$14.79	\$36.10	69.40%
Connecticut	NA	NA	NA	NA
Delaware	NA	NA	NA	NA
Florida	\$16.77	\$13.55	\$30.32	80.80%
Georgia	\$18.12	\$13.97	\$32.09	77.10%
Hawaii	NA	NA	NA	NA
Idaho	\$14.51	\$22.86	\$37.37	157.55%
Illinois	NA	NA	NA	NA
Indiana	\$16.19	\$8.56	\$24.75	52.87%
Iowa	\$13.92	\$10.48	\$24.40	75.29%
Kansas	\$13.55	\$14.52	\$28.07	107.16%
Kentucky	NA	NA	NA	NA
Louisiana	\$21.95	\$22.29	\$44.24	101.55%
Maine	\$11.09	\$14.54	\$25.63	131.11%
Maryland	NA	NA	NA	NA
Massachusetts	NA	NA	NA	NA
Michigan	\$11.31	\$8.56	\$19.87	75.69%
Minnesota	\$15.25	\$7.77	\$23.02	50.95%
Mississippi	\$21.40	\$17.96	\$39.36	83.93%
Missouri	\$13.91	\$12.11	\$26.02	87.06%
Montana	\$13.39	\$18.31	\$31.70	136.74%
Nebraska	\$12.90	\$19.93	\$32.83	154.50%
Nevada	\$15.56	\$15.30	\$30.86	98.33%
New Hampshire	\$11.20	\$10.84	\$22.04	96.79%
New Jersey	NA	NA	NA	NA
New Mexico	\$16.26	\$46.96	\$63.22	288.81%
New York	\$16.33	\$9.82	\$26.15	60.13%
North Carolina	\$19.07	\$4.87	\$23.94	25.54%
North Dakota	\$14.22	\$24.23	\$38.45	170.39%
Ohio	\$18.31	\$3.57	\$21.88	19.50%
Oklahoma	\$13.94	\$19.90	\$33.84	142.75%
Oregon	\$15.99	\$13.32	\$29.31	83.30%
Pennsylvania	\$12.09	\$12.87	\$24.96	106.45%
Rhode Island	NA	NA	NA	NA
South Carolina	\$18.37	\$6.43	\$24.80	35.00%
South Dakota	\$11.85	\$16.35	\$28.20	137.97%
Tennessee	\$16.67	\$6.16	\$22.83	36.95%
Texas	\$15.55	\$27.39	\$42.94	176.14%
Utah	\$12.60	\$16.53	\$29.13	131.19%
Vermont	\$15.15	\$13.53	\$28.68	89.31%
Virginia	\$13.05	\$12.89	\$25.94	98.77%
Washington	\$13.10	\$12.84	\$25.94	98.02%
West Virginia	\$25.56	\$23.81	\$49.37	93.15%
Wisconsin	\$13.49	\$3.96	\$17.45	29.36%
Wyoming	\$16.05	\$19.21	\$35.26	119.69%
Total	\$15.91	\$12.84	\$28.75	80.70%

## APPENDIX B

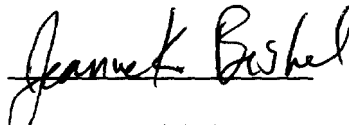
### Average, Highest, and Lowest Shifts of Costs to the Local Jurisdiction Due to Eliminating Support Mechanisms for the OPASTCO Study Group LECs

State	Average Shift to Local Jurisdiction (A)	Highest Shift to Local Jurisdiction (B)	Lowest Shift to Local Jurisdiction (C)
Alabama	\$11.48	\$26.27	\$4.48
Alaska	\$13.79	\$130.23	\$1.56
Arizona	\$9.64	\$46.84	\$3.44
Arkansas	\$11.95	\$36.53	\$6.91
California	\$28.13	\$71.23	\$16.96
Colorado	\$14.79	\$58.73	\$5.22
Connecticut	NA	NA	NA
Delaware	NA	NA	NA
Florida	\$13.55	\$21.69	\$8.59
Georgia	\$13.97	\$25.26	\$6.13
Hawaii	NA	NA	NA
Idaho	\$22.86	\$77.48	\$8.29
Illinois	NA	NA	NA
Indiana	\$8.56	\$26.01	\$5.48
Iowa	\$10.48	\$28.50	\$8.61
Kansas	\$14.52	\$44.67	\$5.14
Kentucky	NA	NA	NA
Louisiana	\$22.29	\$47.52	\$12.60
Maine	\$14.54	\$23.81	\$11.03
Maryland	NA	NA	NA
Massachusetts	NA	NA	NA
Michigan	\$8.56	\$31.44	\$5.34
Minnesota	\$7.77	\$16.58	\$6.31
Mississippi	\$17.96	\$42.63	\$14.58
Missouri	\$12.11	\$29.66	\$4.86
Montana	\$18.31	\$50.64	\$9.64
Nebraska	\$19.93	\$42.13	\$11.26
Nevada	\$15.30	\$86.36	\$7.78
New Hampshire	\$10.84	\$100.40	\$5.86
New Jersey	NA	NA	NA
New Mexico	\$46.96	\$126.08	\$10.55
New York	\$9.82	\$64.93	\$4.45
North Carolina	\$4.87	\$15.25	\$1.26
North Dakota	\$24.23	\$37.06	\$13.49
Ohio	\$3.57	\$15.31	\$3.09
Oklahoma	\$19.90	\$48.15	\$11.59
Oregon	\$13.32	\$163.48	\$5.63
Pennsylvania	\$12.87	\$15.19	\$8.29
Rhode Island	NA	NA	NA
South Carolina	\$6.43	\$29.89	\$2.51
South Dakota	\$16.35	\$62.63	\$10.63
Tennessee	\$6.16	\$11.99	\$4.34
Texas	\$27.39	\$180.10	\$11.48
Utah	\$16.53	\$54.03	\$7.16
Vermont	\$13.53	\$17.90	\$9.46
Virginia	\$12.89	\$12.89	\$12.89
Washington	\$12.84	\$36.15	\$6.87
West Virginia	\$23.81	\$27.70	\$23.28
Wisconsin	\$3.96	\$16.12	\$1.49
Wyoming	\$19.21	\$25.65	\$11.60
Total	\$12.84	\$180.10	\$1.26

*APPENDIX C*

*CERTIFICATE OF SERVICE*

I, Jeanne K. Bishel, do hereby certify that a true and correct copy of the foregoing  
Comment by the Office of Advocacy, United States Small Business Administration was  
served on this \_\_\_\_ day of December, 1996 by first-class United States mail, postage  
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